

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

HEALTHMATE INTERNATIONAL, LLC
and ERISONIC INNOVATION
TECHNOLOGY, LLC,

Plaintiffs,

v.

HONG QIANGXING ELECTRONICS
LIMITED and SHENZHEN GENUIS
CHIP ELECTRONIC CO., LTD.

Defendants.

Case No. 4:15-cv-00840

DECLARATION OF RAYMOND HSU IN
SUPPORT OF OPPOSITION TO MOTION
FOR ENTRY OF DEFAULT

I, Raymond Hsu, do hereby declare as follows:

1. I am the President for Defendants in this action.
2. Service of the summons and complaint in this action was made on the Defendants on October 28, 2015 at Georgia World Congress Center in Atlanta, Georgia while Defendants were there for a trade show.
3. I did not return to China until November 2, 2015.
4. I cannot read English. I had to find an attorney in China, who was familiar with the laws of the United States. Once I returned to China I began searching such an attorney. However, it took some time. After some searching, I located and consulted a few Chinese attorneys with knowledge of the laws of the United States and was advised to seek an attorney in the United States.
5. On December 1, 2015, I engaged the InHouse Co. Law Firm and attorney Alexander Chen in the United States, who proceeded with due dispatch to investigate and prepare the necessary filings.

6. I am advised and believe that I have a complete defense to the complaint filed in this action and that I am not indebted to plaintiff for any amount. Furthermore, I was not served within the State of Missouri and do not conduct any business in the State of Missouri, and as such, I am advised that I may not be subject to the jurisdiction of this Court.

7. After a thorough and diligent internal investigation, I declare, under penalty of perjury, that Defendants have not knowingly sold any counterfeits or distributed any operational manual bearing liked trademarks of '888 and '384 and have no information that Defendants indirectly sold any counterfeits or distributed any operational manual bearing liked trademarks of '888 and '384.

8. I have instructed my attorneys to engage in settlement negotiations with the Plaintiffs in order to resolve this matter. However, until a fair resolution is reached, it would be unfair to deprive me of the right to the adjudication of the allegations of the Plaintiffs' Complaint, on their merits, as accorded by the law of the United States.

9. I have no reason to believe that the Plaintiff will suffer prejudice if this Court denies the motion and allow the Defendants to defend the case on its merits.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 28th day of December 2015.



Raymond Hsu

Certificate of Service

I here certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record receiving electronic notification and that I served the foregoing by first-class mail, postage prepaid, upon any counsel of record not receiving electronic notification.